

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NORTH DAKOTA

In re:)	Case No. 25-30002
)	(Chapter 11)
GENERATIONS ON 1ST, LLC)	
)	
Debtor)	
_____)	
)	
In re:)	Case No. 25-30003
)	(Chapter 11)
PARKSIDE PLACE, LLC)	
)	
Debtor)	
_____)	Jointly Administered

MOTION TO EXPEDITE SECOND CASH COLLATERAL HEARING

Come now Generations on 1st, LLC (“Generations”) and Parkside Place, LLC (“Parkside”) (collectively, the “Debtors,” and each a “Debtor”), by and through undersigned proposed counsel, pursuant to Local Rule 9006-1, and move this Honorable Court to hold an expedited hearing, in consideration of the Debtors’ Second Motion for Leave to Use Cash Collateral (the “Second Cash Collateral Motion”), and in support thereof state as follows:

As set forth in the Second Cash Collateral Motion, the terms underlying the Debtors’ use of cash collateral is presently set to expire on March 15, 2025. The Debtors operate eponymous apartment buildings in Watertown, South Dakota and require the use of rental proceeds to manage the properties—both for the benefit of the maintenance of the assets themselves and, too, for the benefit of the myriad tenants occupying the two buildings. RRSB appears to have a lien on those rents (albeit one that is contested) and, accordingly, approval of any forward-looking use of cash collateral is critical to the preservation of these two estates and the reorganizational ambitions of both Debtors.

The Local Rules of this Honorable Court permit expedited hearings. Local Rule 9006-1. Consistent with those rules, the Debtors submit as follows:

- a. The grounds of the Second Cash Collateral Motion are set forth therein (albeit incorporating, by reference, the grounds set forth in the original cash collateral motion);
- b. The Debtors propose a hearing date of Friday, March 14, 2025, at a time of this Honorable Court's choosing, for the Second Cash Collateral Motion; and
- c. The Debtors propose responses to the Second Cash Collateral Motion be due by 5:00 pm prevailing central time on Wednesday, March 12, 2025.

Respectfully Submitted,

Dated: March 3, 2025

By: /s/ Maurice B. VerStandig
Maurice B. VerStandig, Esq.
The Dakota Bankruptcy Firm
1630 1st Avenue N
Suite B PMB 24
Fargo, North Dakota 58102-4246
Phone: (701) 394-3215
mac@dakotabankruptcy.com
Counsel for the Debtors

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 3rd day of March, 2025, a copy of the foregoing was served electronically upon filing via the ECF system.

/s/ Maurice B. VerStandig
Maurice B. VerStandig